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8  
9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 MEGAN E. KLATT, an individual, on behalf of  
herself and all others similarly situated,

12 Plaintiff,

13 vs.

14 DIGNITY HEALTH, a California corporation;  
15 DOES 1-50, unknown individuals; and ROE  
COMPANIES 1-50, unknown business entities,

16 Defendants.  
17

Case No. 2:17-cv-02425-RFB-PAL

**STIPULATION TO STAY BRIEFING  
SCHEDULING ON MOTION FOR  
PROTECTIVE ORDER**

**(First Request)**

18 Megan Klatt, Plaintiff, and Dignity Health, Defendant (collectively Plaintiff and Defendant  
19 are referred to herein as the “Parties”), by and through their respective undersigned counsel,  
20 stipulate and agree to stay briefing in and the Court’s consideration of Defendant’s Motion for  
21 Protective Order (ECF No. 40) (“Defendant’s Motion”), for a three week period measured from  
22 May 18, 2018, which is the due date for Plaintiff’s Opposition. The three week stay is requested to  
23 allow the Parties to continue discussions toward the goal of eliminating the need for the Court to  
24 consider Defendant’s Motion. At the conclusion of the stay, the Parties shall submit a stipulation  
25 notifying the Court of one of the following: (i) the Parties have reached agreement regarding the  
26 issues raised in Defendant’s Motion rendering Defendant’s Motion moot; (ii) the Parties have not  
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28

1 reached agreement regarding the issues raised in Defendant's Motion resulting in an agreed upon  
2 briefing schedule pertaining to all unresolved issues; or (iii) the Parties seek additional time to  
3 resolve the issues presented in Defendant's Motion.

4 On May 16, 2018 the Court issued a minute order scheduling a hearing on the Defendant's  
5 Motion for June 12, 2018 at 10:00 a.m. Given the agreement of the Parties as set forth above, it is  
6 requested that the Court vacate the scheduled hearing.

7 This stipulation is submitted in good faith and not for the purpose of delay.

8 DATED this 17th day of May 2018.

DATED this 17th day of May 2018.

9 SEMENZA KIRCHER RICKARD

JACKSON LEWIS P.C.

10 /s/ Lawrence J. Semenza III

/s/ Elayna J. Youchah

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14 *Attorneys for Plaintiff Megan E. Klatt*  
15 *and all others similarly situated*

*Attorneys for Defendant Dignity Health*

### 16 ORDER

17 IT IS HEREBY ORDERED THAT, the briefing schedule and the Court's consideration of  
18 Defendant, Dignity Health's Motion for Protective Order (ECF No. 40) shall be stayed through and  
19 including June 12. On or before the end of the day on June 8, Plaintiff and Defendant shall submit  
20 a stipulation notifying Court that (i) identifies whether ECF No.40 is moot, (ii) provides the Court  
21 with a revised briefing schedule on remaining issues presented in Defendant's Motion, or (iii)  
22 explains the need for more time to resolve issues addressed by ECF No. 40.

23 The hearing presently scheduled for June 12, 2018 relating to Defendant's Motion shall be  
24 vacated.

25   
26 UNITED STATES MAGISTRATE JUDGE

27 DATED: May 18, 2018  
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